

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DERRICK EVANS,

Plaintiff,

v.

**THE HUFFINGTON POST.COM, INC.
and ASHLEY FEINBERG,**

Defendants.

Case No. 1:19-cv-536-HSO-JCG

**PLAINTIFF’S MOTION FOR JURISDICTIONAL DISCOVERY, TO DENY WITHOUT
PREJUDICE DEFENDANTS’ MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION, OR, IN THE ALTERNATIVE, TO STAY PLAINTIFF’S DEADLINE
TO RESPOND**

For the reasons set forth in the memorandum brief submitted concurrently herewith, Plaintiff Derrick Evans moves this Court to allow jurisdictional discovery. In support of this Motion, Plaintiff Derrick Evans submits a Memorandum of Authorities and the following exhibits:

Exhibit “A”: Comment Login

Exhibit “B”: Member Signup

Exhibit “C”: Free Member Signup Page

Exhibit “D”: HuffPost Stuff Main Website

Exhibit “E”: Terms of Service

Exhibit “F”: Privacy Policy Excerpt

Exhibit “G”: Privacy Dashboard

Exhibit “H”: Collection of Mississippi Articles

Exhibit “I”: Huffington Post Article on Derrick Evans

Exhibit “J”: Derrick Evans Email Exchange with Huffington Post Reporter

Exhibit “K”: Huffington Post Reporter Ja’han Jones Tweets

Exhibit “L”: Ja’han Jones Emmitt Till Memorial Story

Exhibit “M”: Mississippi Targeted Ads

This is the 28th day of October, 2019.

DERRICK EVANS

By his attorneys,

s/ Charles E. Cowan

John P. Sneed, Bar No. 7652

Charles E. Cowan, Bar No. 104478

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

This is the 28th day of October, 2019.

s/ Charles E. Cowan

CHARLES E. COWAN